

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
Call Signs E100119 and E100122

DIRECTV Enterprises, LLC (“DIRECTV”) hereby requests Special Temporary Authority (“STA”) for 60 days beginning January 31, 2011 to conduct on-site performance verification testing solely in the frequency bands 29.5-30.0 GHz (uplink) and 19.7-20.2 (downlink) of the 9.2-meter Ka-band earth station antennas recently installed at DIRECTV’s uplink facilities in Washington while its license applications are being processed (*see* IBFS File Nos. SES-LIC-20101029-01371 and -01373).

These earth station antennas are designed to communicate with DIRECTV’s growing Ka-band satellite fleet. DIRECTV filed its applications in October, and the last public comment period closed over a month ago. No comments were filed in any of these proceedings, so the applications are unopposed.

However, DIRECTV understands that, although the 29.25-29.5 GHz band DIRECTV seeks to use is not available for terrestrial use,¹ a limited number of terrestrial authorizations issued prior to July 1996 for temporary fixed operations in several bands, including 27.5-29.5 GHz, remain outstanding.² Under the Commission’s rules, such temporary operations may be conducted at a given location for a period of no more than six months, and are subject to prior coordination with existing licensees, permittees, and applicants in the area whose facilities could affect or be affected by such temporary operations.³ Moreover, the operator is required to notify the Commission at least five days prior to installation of such temporary facilities, providing the location and operational parameters for its system and confirmation that required coordination with earth station facilities has been completed.⁴ Although DIRECTV has been operating other antennas in this band at these locations for several years, at no time has it experienced interference from a terrestrial wireless system, been informed that it has caused interference to a terrestrial wireless system, or been approached for coordination with a terrestrial wireless system. Nor has DIRECTV been able to find any evidence in the Commission’s records of a notification of temporary authorizations in the relevant band in the area near DIRECTV’s earth station sites. Nonetheless, it appears that these terrestrial authorizations continue to delay processing of DIRECTV’s applications.

¹ *See* 47 C.F.R. §§ 101.101, 101.147(a) (2007) (listing frequencies available for fixed wireless use in this band as 27.5-28.35 GHz and 29.1-29.25 GHz).

² *See id.*, § 101.4. Such systems are subject to the requirements under Part 21 as in effect in July 1996.

³ *See* 47 C.F.R. §§ 21.706(d), 21.707(a) (1995). *See also* 47 C.F.R. §§ 101.31(a)(i), 101.103(d) (2007) (apply same requirements today).

⁴ *See* 47 C.F.R. § 21.708 (1995).

Accordingly, in order to conduct testing while this issue is being resolved, DIRECTV requests an STA to operate these earth stations on the frequencies that are not licensed to any terrestrial systems. During these tests, the earth stations will communicate with DIRECTV's Ka-band satellites at either 99° W.L. or 103° W.L within the parameters set forth in the above referenced applications. In addition, DIRECTV will test the antenna's ability to sustain full-power operations over an extended period (approximately 24 hours), as well as its de-icing capabilities. For this part of the testing, DIRECTV will point the antenna to zenith which, for the location of the antennas under consideration here, will direct the main beam of the antenna well away from the geostationary arc. DIRECTV will, of course, operate on a non-interference basis and immediately discontinue transmissions if alerted to any problems.

The requested STAs would serve the public interest by allowing DIRECTV to perform the testing necessary to establish the performance of its earth station antennas and resolve any issues in preparation to operate the above referenced earth stations on a commercial basis. DIRECTV therefore respectfully requests that the Commission grant this STA request as expeditiously as possible.